

DANIEL D. MAULER
 Trial Attorney
 U.S. Department of Justice
 Civil Division – Federal Programs Branch
 1100 L Street, NW
 Washington, DC 20005
 Telephone: (202) 616-0773
 Facsimile: (202) 616-8470
 E-mail: dan.mauler@usdoj.gov

COUNSEL FOR DEFENDANTS

DONALD J. TRUMP, President of the
 United States; WILLIAM P. BARR, Attorney
 General of the United States; UNITED
 STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF OREGON

<p>THE STATE OF OREGON, <i>et al.</i>,</p> <p><i>Plaintiffs,</i></p> <p>v.</p> <p>DONALD J. TRUMP, President of the United States,, <i>et al.</i>,</p> <p><i>Defendants.</i></p>	<p>Civil Action No. 6:18-cv-01959-MC</p> <p>DEFENDANTS' <i>UNOPPOSED</i> MOTION FOR THREE-WEEK EXTENSION OF TIME</p>
---	---

DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO RESPOND

Defendants, Donald J. Trump, in his official capacity as President of the United States; William P. Barr, in his official capacity as Attorney General of the United States; and the United States of America (collectively, the “Defendants”), respectfully request an extension of time of three weeks, until May 13, 2019, in which to respond and reply to Plaintiffs’ Combined Motion for Summary Judgment and Response to Defendants’ Motion to Dismiss (ECF No. 21) (“Plaintiffs’ Combined Motion”). In support of this motion, Defendants state the following:

1. After conferring regarding the schedule for briefing in this case, the parties reached an agreement regarding the timing of the Plaintiffs' Combined Motion (ECF No. 21) and Defendants' response thereto. As part of this agreement, the Plaintiffs were accorded an additional three weeks to prepare their filing that culminated in ECF No. 21. This Court approved that three-week extension for the Plaintiffs. *See* ECF No. 18 (order granting motion for extension of time to Plaintiff's Motion).
2. Currently, the Defendants' response to Plaintiffs' Combined Motion, which will include a Reply in support of Defendants' Motion to Dismiss (ECF No. 14), is due on April 22, 2019. But under the agreement between the parties, the Defendants would be accorded an additional three-weeks to prepare this filing, yielding a new deadline of May 13, 2019.
3. Defendants now request that this Court formally extend their deadline to file their combined response and reply, from April 22nd to May 13th, consistent with the agreement between the parties.
4. Counsel for Defendants has conferred with Plaintiffs' counsel about this extension request, and Plaintiffs' counsel have advised that they consent to this request.
5. The parties agree that no hearing is necessary on this motion.

WHEREFORE, Defendants respectfully request that the Court grant an extension of time to May 13, 2019, for Defendants to file their combined opposition and reply brief in response to Plaintiffs' Combined Motion (ECF No. 21).

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

BILLY J. WILLIAMS
United States Attorney

JOHN TYLER
Assistant Director

/s/ Daniel D. Mauler
DANIEL D. MAULER
Virginia State Bar No. 73190
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20001
Tel: (202) 514-8095
Fax: (202) 616-8470
E-mail: dan.mauler@usdoj.gov
Counsel for Defendants